

Exhibit D

Confidential - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION
4 - - -
5

6 IN RE: ETHICON, INC. : MDL NO. 2327
7 PELVIC REPAIR SYSTEM, :
8 PRODUCTS LIABILITY :
9 LITIGATION :
10 - - -

11 AND VARIOUS OTHER CROSS-NOTICED ACTIONS
12 CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER
13

14 - - -
15 December 23, 2014
16 - - -

17 Videotaped deposition of KATRIN
18 ELBERT, Ph.D. taken pursuant to notice, was held
19 at the law offices of Riker Danzig Scherer Hyland &
20 Perretti LLP, Headquarters Plaza, One Speedwell
21 Avenue, Morristown, New Jersey, beginning at 8:58 a.m.,
22 on the above date, before Ann Marie Mitchell, a
23 Federally Approved Certified Realtime Reporter,
24 Registered Diplomate Reporter and Notary Public for
25 the State of New Jersey.

26 - - -
27 GOLKOW TECHNOLOGIES, INC.
28 877.370.3377 ph|917.951.5672 fax
29 deps@golkow.com
30

Confidential - Subject to Protective Order

1 Q. And you would have had a design
2 review meeting like that after each one of the
3 stages set forth in appendix IV of PR 364?

4 A. Yes.

5 Q. Now, what is a design history file?

6 A. So the design history file is the --
7 it's the archive of all the documents that show us
8 the history of the design of the product. It
9 contains all of our design control documents, and
10 it's also what we use to support regulatory
11 submissions.

12 Q. And as the project leader, do you
13 have a specific responsibility regarding the design
14 history file?

15 A. Yes. In the end, I have the ultimate
16 responsibility that all the required documents are
17 collected in the DHF, the design history file.

18 Q. Is it one of your jobs is to make
19 sure everything that's supposed to be in the DHF
20 gets put in the DHF?

21 A. Yes, that's one of my jobs.

22 Q. And did you do that for TVT ABBREVO?

23 A. Yes, I do.

24 Q. And are the three-ring binders that
25 are behind your left shoulder, is that a printout of